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**From:** Messina, Edward [Messina.Edward@epa.gov]  
**Sent:** 3/12/2012 4:30:57 PM  
**To:** Julie Simpson [Simpson.JulieLNDU@usepa.onmicrosoft.com]; David Stangel [Stangel.DavidLNDU@usepa.onmicrosoft.com]; Ambrosino, Helene [Ambrosino.Helene@epa.gov]  
**CC:** Duffy, Rick [Duffy.Rick@epa.gov]; Ann Pontius [Pontius.AnnLNDU@usepa.onmicrosoft.com]  
**Subject:** Fw: top 5 drifters?  
**Attachments:** Registration Review Status of Pesticides Most Frequently Associated with Drift Incidents 3\_5\_12.docx

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Edward J. Messina  
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----- Forwarded by Edward Messina/DC/USEPA/US on 03/12/2012 12:30 PM -----

**From:** Rosemarie Kelley/DC/USEPA/US  
**To:** Cynthia Giles-AA/DC/USEPA/US@EPA, Steven Chester/DC/USEPA/US@EPA  
**Cc:** Pam Mazakas/DC/USEPA/US, Kate Anderson/DC/USEPA/US@EPA, Don Lott/DC/USEPA/US, Brian Joffe/DC/USEPA/US, Kim Wilson/DC/USEPA/US, Mike Fisher/DC/USEPA/US@EPA, Edward Messina/DC/USEPA/US@EPA  
**Date:** 03/06/2012 06:43 PM  
**Subject:** Fw: top 5 drifters?

Cynthia and Steve -

Here is the current status of registration review for the pesticides that are most frequently involved in drift incidents.

I have been thinking a bit more about OCSPP's assertion that the "causes harm" language makes the label more protective. I continue to believe that a pesticide label that "prohibits drift that causes harm," does not provide any additional protection because it provides no meaningful standard for applicators to follow. Applicators essentially would be left to make risk/benefit decisions whenever they apply pesticides. They will decide whether to apply a pesticide based on their perceived risk of causing harm. They will likely weigh that perceived risk against the perceived benefits. It is easy to see how this risk/benefit analysis would lead applicators to take chances, as in Mike Fisher's example where

the applicator decides to continue applying pesticides after the wind speed has picked up because he is on deadline and needs to get three more fields sprayed.

By the way, Bob P's office has cancelled Friday's spray drift meeting, but notes that it will be rescheduled.

Rosemarie A. Kelley, Director  
Waste and Chemical Enforcement Division  
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----- Forwarded by Rosemarie Kelley/DC/USEPA/US on 03/06/2012 06:16 PM -----

From: William Jordan/DC/USEPA/US  
To: Enrique Manzanilla/R9/USEPA/US@EPA, Louise Wise/DC/USEPA/US@EPA, Steven Bradbury/DC/USEPA/US@EPA  
Cc: Dore LaPosta/R2/USEPA/US@EPA, Margaret Guerriero/R5/USEPA/US@EPA, Edward Kowalski/R10/USEPA/US@EPA, kelley.rosemarie@epa.gov, Mardi Klevs/R5/USEPA/US@EPA, Pam Cooper/R9/USEPA/US@EPA, Margaret Alkon/R9/USEPA/US@EPA, Nancy Marvel/R9/USEPA/US@EPA, perlis.robert@epa.gov  
Date: 03/06/2012 06:10 PM  
Subject: Fw: top 5 drifters?

Enrique --

In your email you asked that OPP provide information on the registration review status of pesticide active ingredients on a list developed by AAPCO which identifies pesticides most frequently associated with drift incidents. Here is the information that OPP staff pulled together in response to that request.

Thanks,

Bill

William L. Jordan  
Senior Policy Adviser  
Office of Pesticide Programs -- Mail code 7501P  
U. S. Environmental Protection Agency  
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----- Forwarded by William Jordan/DC/USEPA/US on 03/06/2012 06:05 PM -----

From: Jill Bloom/DC/USEPA/US  
To: William Jordan/DC/USEPA/US@EPA  
Cc: Cathryn Britton/DC/USEPA/US@EPA

Date: 03/05/2012 07:35 AM  
Subject: Fw: top 5 drifters?

Bill,

Registration Review Status of Pesticides Most Frequently Associated with Drift Incidents  
As reported in AAPCO survey, 2005

Pesticide ai	Docket Opening	Projected Final Decision
2,4-D	3/20/2013	2019
Glyphosate	6/24/2009	2015
Atrazine	3/20/2013	2019
Malathion	6/24/09	2015
Dicamba		
Paraquat	12/21/11	Not yet scheduled 2017
Picloram	12/25/13	2019
Pendimethalin	9/19/12	2018



Registration  
Review Status of...

Jill  
Jill Bloom, Review Manager  
Risk Management and Implementation Branch 2  
Pesticide Re-evaluation Division  
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----- Forwarded by Jill Bloom/DC/USEPA/US on 03/05/2012 07:32 AM -----

From: William Jordan/DC/USEPA/US  
To: "Jill Bloom" <Bloom.Jill@epamail.epa.gov>  
Date: 03/02/2012 02:47 PM  
Subject: Fw: top 5 drifters?

Fyi. For now would just check the reg review status of the 9 chems, please.

Thanks

Bill

----- Original Message -----

**From:** Steven Bradbury

**Sent:** 03/02/2012 02:38 PM EST  
**To:** William Jordan  
**Subject:** Fw: top 5 drifters?

Fyi

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Sent by EPA Wireless E-Mail Services.

----- Original Message -----

**From:** Enrique Manzanilla  
**Sent:** 03/02/2012 11:23 AM PST  
**To:** Louise Wise; Steven Bradbury  
**Cc:** Dore LaPosta; Margaret Guerriero; Edward Kowalski; Rosemarie Kelley; Mardi Klevs; Pam Cooper; Margaret Alkon; Nancy Marvel; Robert Perlis  
**Subject:** top 5 drifters?

Hi Louise and Steve:

During the call earlier this week, there was some mention of the "priority" drift pesticides. My staff thinks its based on the AAPCO enforcement survey as noted below. Not 5 but 9?

Can you all clarify so we're working from the same list? Also, if OPP staff can describe and share their status that would be great.

Enrique Manzanilla  
Director, Communities and Ecosystems Division  
US EPA Region 9-Pacific Southwest  
(415) 972-3843

----- Forwarded by Enrique Manzanilla/R9/USEPA/US on 03/02/2012 11:15 AM -----

**From:** Pam Cooper/R9/USEPA/US  
**To:** Enrique Manzanilla/R9/USEPA/US@EPA  
**Date:** 03/02/2012 11:12 AM  
**Subject:** Fw: top 5 drifters

I think you may want to take out some of her language, but this is what Katy found.

pc

Pamela Cooper, Manager  
Pesticides Office  
USEPA - Region 9  
415.947.4217

----- Forwarded by Pam Cooper/R9/USEPA/US on 03/02/2012 10:54 AM -----

**From:** Katy Wilcoxon/R9/USEPA/US  
**To:** Cooper.pam@epa.gov  
**Date:** 03/01/2012 02:25 PM  
**Subject:** top 5 drifters

Actually, I have the top 9 drifters.

This list is based on a 2005 AAPCO Pesticide Drifte Enforcemetn Survey in which SLAs were asked to list the 5 pesticide

a.i's most commonly involved in confirmed occurrences. I managed to look up Glysophate and found that it is in the Data Submission phase until Sept 2012 then open for public comment for the preliminary risk assessment....with a final decision set for 2015. That means, three more years before any product specific language makes it on the label but we could get a general statement first....

2, 4-D and Glyphosate hands down 1st and 2nd place for three years running. After that came these:

Atrazine

Malathion

Atrazine

Dicamba

Malathion

Paraquat

Picloram

pendimethalin

Katy Wilcoxon

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Agricultural Worker Safety Program Manager

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Visit <http://www.epa.gov/pesticides>